STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006



May 14, 2002

Bob Bachmann
Ecology, Range, Watershed and Air
US Forest Service
P.O. Box 3623
Portland, OR 97208-3623

SUBJECT: Satsop Combustion Turbine Project, PSD No. EFSEC/2001-01
Prevention of Significant Deterioration Application Supplemental Information

Dear Mr. Bachman:

We received revised dispersion modeling and visibility impact information from the above applicant for their project. On January 8, 2002, the National Park Service commented on the original application, and indicated that "the proposed increases from the Satsop facility will not have any adverse impacts"

Please note that the revised visibility impact modeling results indicate that there will be one additional day per year with visibility impacts above a 5% change in light extinction than was predicted in the original submittal. The additional day with a predicted change in light extinction >5% is in February, at the Olympic National Park.

The values of the predicted impairment changes are higher than in the previous application, and at some locations the impacted day has changed. The highest value in the December submittal was 7.55% at Olympic National Park, the new value for the same day and location is now 9.07%.

The difference in magnitude of impact is entirely due to using a different, higher natural gas sulfur content value, than was used for the previous analysis. The new value used is 1.3 grains
S/100 standard cubic feet (scf) which is higher than the 0.2 grains S/100 scf used previously and nationally. Additionally, the impact analysis evaluated visibility and

ambient impacts during the May-June time period at a natural gas sulfur content of 3 grains S/100 scf. This is a value which might be reached during the annual maintenance outage at the natural gas treatment plants in northern British Columbia. Based on additional analyses we have done and with the assistance of Williams Pipeline Co., different, slightly lower, natural gas sulfur content values are being established for ambient air quality impact analyses in future permits.

A copy of the new air quality impact information and project emissions is attached to this letter. Please let me know as soon as possible if you have any concerns or require additional information about the results of the revised modeling.

I am preparing a preliminary approval amending PSD No. EFSEC/2001-01, along with a fact sheet summarizing the permitting issues (including natural gas sulfur content and visibility impacts), and permit recommendations.

You can contact me at (360) 407-6810 or e-mail me at anew461@ecy.wa.gov.

Sincerely,

Alan R. Newman, P.E.
Senior Engineer
Technical, Information, and Engineering Services
Air Quality Program

cc: Dan Meyer, EPA Region X
Irina Makarow, EFSEC

AN:rl